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Attorneys for Plaintiff WELTON JOHNSON

DISTRICT COURT

CLARK COUNTY, NEVADA

WELTON JOHNSON, an individual,

Plaintiff,

vs.

WESTERN HOTEL & CASINO, a Nevada
limited liability company; PLAYLV GAMING
OPERATIONS, a Nevada limited liability
company; DOES I through X, inclusive; ROE
CORPORATIONS, I through X, inclusive,
Defendants.

PLAINTIFF'S PROPOSED
VOIR DIRE QUESTIONS

Trial date: December 2, 2013

Honorable Philip M. Pro

Plaintiff Welton Johnson requests that, at such time as voir dire of the jury venire is
conducted, the Court ask the jury each of the attached questions number 1 through 6.

Dated this ___ day of November, 2013

Respectfully submitted,

COGBURN LAW OFFICES

By: /s/ Andrew Rempfer
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**PLAINTIFF'S REQUESTED VOIR DIRE
QUESTION NUMBER 1**

Does anyone on the this panel know:

- Paulette Swenson
- Henry Terry
- Brian Smith
- Deborah Knowles
- Frank Hingeda
- any former employee, owner or agent of Western Hotel & Casino
- any employee, owner or agent of PlayLV Gaming Operations, LLC

**PLAINTIFF'S REQUESTED VOIR DIRE
QUESTION NUMBER 2**

The facts in this case include Plaintiff Welton Johnson's employment relationship with Defendants Western Hotel & Casino and PlayLV Gaming Operations, LLC. Does anyone on the panel have any knowledge of this case?

**PLAINTIFF'S REQUESTED VOIR DIRE
QUESTION NUMBER 3**

Are there any members of this panel who are or have worked in the security industry, or who have family members or close friends who are so employed?

**PLAINTIFF'S REQUESTED VOIR DIRE
QUESTION NUMBER 4**

Are there any members of this panel who are or have been engaged in or employed in the hotel industry, or who have family members or close friends who are so employed?

**PLAINTIFF'S REQUESTED VOIR DIRE
QUESTION NUMBER 5**

Are there any members of this panel who feel for any reason not discussed, that they could not sit and hear this case and thereafter render a verdict which would be fair and impartial to both the Plaintiff and the Defendant under the evidence as it may be presented?

**PLAINTIFF'S REQUESTED VOIR DIRE
QUESTION NUMBER 6**

If you determine that the Defendants discriminated against the Plaintiff on the basis of race, would you, for any reason, be unable to award statutory damages as instructed by the Court in addition to actual damages?